

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA**  
**Plaintiff**

**v.**

**301 ADAMS STREET, QUINCY,  
MASSACHUSETTS; 1548-1558  
DORCHESTER AVENUE, DORCHESTER,  
MASSACHUSETTS; FIVE (5) CERTAIN  
PARCELS OF LAND WITH THE BUILDING(S)  
THEREON IN BROCKTON PLYMOUTH COUNTY,  
MASSACHUSETTS, COMMONLY KNOWN AS  
11 ROSSETER STREET, 16 ROSSETER, 213-223  
NORTH MAIN STREET, 204 NORTH MONTELLO  
STREET, INCLUDING ALL APPURTENANCES AND  
IMPROVEMENTS THERON; \$67,561.88 IN UNITED  
STATES CURRENCY; AND \$26,776.42 IN UNITED  
STATES CURRENCY, SEIZED FROM ASIAN AMERICAN )  
BANK CHECKING ACCOUNT NUMBER 310029269 )**

**Defendants**

**Civil Action  
No. 04-12582-RCL**

**ANSWER OF TINA LE TO AMENDED VERIFIED  
COMPLAINT FOR FORFEITURE IN REM**

Now comes, Tina Le, and by and through undersigned counsel, answers the Amended Verified Complaint For Forfeiture In Rem, without prejudice and without waiving any Fifth Amendment right against self-incrimination she has in any pending or future criminal indictments in relation to the allegations set forth in the Affidavit of Brad Carpenter attached to the Complaint and incorporated by reference therein, as a person who has asserted an interest in the specific property defendants. Tina Le's specific claims to the property defendants are attached hereto as Exhibit A. Tina Le answers as follows:

1. Paragraph 1 of the Complaint states conclusions of law to which no response is required.

2. Tina Le is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 2 of the Complaint.
3. Tina Le is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 3 of the Complaint.
4. Paragraph 4 of the Complaint states conclusions of law along with beliefs and opinions of the author. Insofar as the Paragraph states opinions and beliefs of the author as to the applicability of the law to the facts set forth, Tina Le is without sufficient knowledge or information to admit or deny the allegations set forth in Paragraph 4 of the Complaint. Insofar as the Paragraph states legal conclusions, there is no response required. All other statements set forth in Paragraph 4 not dealt with above are denied.
5. Paragraph 5 of the Complaint states conclusions of law along with beliefs and opinions of the author. Insofar as the Paragraph states opinions and beliefs of the author as to the applicability of the law to the facts set forth, Tina Le is without sufficient knowledge or information to admit or deny the allegations set forth in Paragraph 5 of the Complaint. Insofar as the Paragraph states legal conclusions, there is no response required. All other statements set forth in Paragraph 5 not dealt with above are denied.
6. Paragraphs 1-171 of the Amended Affidavit of FBI Special Agent Brad Carpenter set forth specific beliefs and opinions of the author along with factual allegations. Tina Le is without sufficient knowledge or information to admit or deny the allegations set forth in Paragraphs 1-171 of the Amended Affidavit of Brad Carpenter attached as Exhibit A and incorporated by reference in the Complaint.

WHEREFORE Tina Le, a person who has asserted an interest in the specific property defendants, by and through undersigned counsel, respectfully requests this Honorable Court deny the United States of America's request for relief and dismiss the Amended Verified Complaint for Forfeiture In Rem.

Dated: November 3, 2005

Respectfully submitted,  
TINA LE  
By her attorneys,

**/s/ Brad Bailey**

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Brad Bailey, (BBO#549749)  
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**EXHIBIT A**

Kristina E. Barclay  
Assistant U.S. Attorney  
Asset Forfeiture Unit  
1 Courthouse Way, Suite 9200  
Boston, MA 02210

**Re: United States of America v. 301 Adams St., Quincy, MA et al**  
**Civil Action No. 04-12582-RCL**

Dear Attorney Barclay:

Please accept this letter as my specific claim of interest in the following properties:

1. The real property and buildings located at 301 Adams Street, Quincy, Massachusetts, having a deed recorded at the Norfolk County Land Court as Document No. 1025853, noted on Certificate of title No. 167544 ("301 Adams");
2. the real property and buildings located at 1548-1558 Dorchester Avenue, Dorchester, Massachusetts having a deed recorded at the Suffolk County Registry of Deeds at Book 32823, Page 262 ("1548 Dorchester");
3. five (5) certain parcels of land with the building(s) thereon in Brockton, Plymouth County, Massachusetts, commonly known as 11 Rosseter Street, 16 Rosseter Street, 213-223 North Main Street 204 North Montello Street and 227 North Main Street, having a deed recorded at the Plymouth County Registry of Deeds, Book 29342, Page 298 ("204 North Montello");
4. \$67,561.88 in United States Currency as converted when seized from 301 Adams Street on December 15, 2004; and
5. \$26,776.42 in United States Currency seized from Asian American Bank Checking Account Number 310029269 on December 15, 2004.

I sign this letter of claim under oath and subject to the penalties of perjury.

Very truly yours,

  
Tina Le